

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE SHIPPING CORPORATION OF INDIA
LTD.

Plaintiff,

-against-

JALDHI OVERSEAS PTE LTD.,

Defendant.

08 Civ. 4328 (JSR)

**ATTORNEY'S AFFIDAVIT IN
SUPPORT OF DEFENDANT'S
MOTION TO VACATE/MODIFY
MARITIME ATTACHMENT ORDER**

STATE OF NEW JERSEY)

) ss:

COUNTY OF BERGEN)

RAHUL WANCHOO, being duly sworn, deposes and says:

1. I am a member of the Bar of the State of New York, and I am admitted to practice before this Honorable Court.
2. I am a principal in the firm of Law Offices of Rahul Wanchoo, attorneys for Defendant, Jaldhi Overseas Pte. Ltd. ("Defendant"). I am fully familiar with the matters set forth in this affidavit, and my knowledge of the matters set forth in this affidavit is based on information provided to me by Defendant, its agents and attorneys and my own independent research.
3. I submit this affidavit in support of Defendant's motion to dismiss the Verified Complaint filed by the Plaintiff, The Shipping Corporation of India Ltd. ("Plaintiff") and vacate or modify the Court's Ex Parte Order of Maritime Attachment dated May 7, 2008 ("Attachment Order").

4. On May 7, 2008 Plaintiff filed a Verified Complaint in the Southern District of New York seeking security for its claim that Defendant allegedly failed to pay hire in the amount of \$3,608,445.00, plus interest of \$757,773.00 and estimated lawyers and arbitrators' fees and costs of \$450,000.00, for a total of \$4,816,218.00. On the same day the Court issued the Attachment Order to attach Defendant's property including EFTs in an amount of up to \$4,816,218.00. Copies of the Verified Complaint and the Attachment Order are annexed as **Exhibits 1 and 2**, respectively to this affidavit.

5. On or about May 14, 2008, Plaintiff restrained \$4,816,218.00 of Defendant's electronic funds transfers ("EFTs") passing through the Bank of New York Mellon, New York pursuant to the Attachment Order. A copy of Plaintiff's Local Admiralty Rule B.2 notice of attachment is annexed as **Exhibit 3** to this affidavit.

6. On May 14, 2008, Plaintiff filed an Amended Verified Complaint. A copy of the Amended Verified Complaint is annexed as **Exhibit 4** to this affidavit. Plaintiff amended its original Complaint and gave Defendant a credit for the first hire installment paid by Defendant on May 7, 2008 in the amount of \$1,260,585.00 (See Exhibit 2 to Amended Verified Complaint). Plaintiff's Amended Verified Complaint reduced the amount sought to be attached as security for Plaintiff's claim by \$126,971.00 from 4,816,218.00 to \$4,689,247.00.

7. On May 16, 2008 we sent an email to Plaintiff's counsel requesting confirmation that any funds attached in excess of the security demanded in Plaintiff's Amended Verified Complaint of \$4,689,247.00 had been released to the Defendant. However, Plaintiff's counsel refused to confirm this fact, and instead requested that we advise if Plaintiff had released any funds originating by the Defendant. Copies of the emails exchanged between

counsel for Plaintiff and Defendant are annexed as **Exhibit 5** to this affidavit. In fact, Plaintiff has to date attached \$4,873,404.90 of EFT's pursuant to the Court's Attachment Order or about **\$184,157.90** more than it sought to attach as per its Amended Verified Complaint.

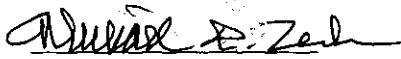
8. As itemized below, out of the \$4,873,404.90 of EFT's presently restrained as a result of the Attachment Order, \$4,590,678.60 are inward remittances to the Defendant as the beneficiary of these funds. Copies of the SWIFT records¹ for the following EFTs are annexed as **Exhibit 6** to this affidavit.

<u>Originator</u>	<u>Beneficiary</u>	<u>Amount Restrained</u>
Sesa Goa Ltd	Jaldhi Overseas Ltd	\$2,377,533.90
Sarat Chatterjee & Co.	Jaldhi Overseas Ltd	\$1,399,960.00
Sarat Chatterjee & Co.	Jaldhi Overseas Ltd.	\$ 449,960.00
Sarat Chatterjee & Co.	Jaldhi Overseas Ltd.	\$ 269,363.72
Bhusan Power & Steel Ltd.	Jaldhi Overseas Ltd.	<u>\$ 93,861.00</u>
		\$4,590,678.60
Jaldhi Overseas Ltd.	Bridge Oil Ltd.	<u>\$ 282,726.35</u>
	TOTAL	<u>\$4,873,404.90</u>

9. A copy of an extract from Plaintiff's web site is annexed as **Exhibit 7** to this affidavit.


 RAHUL WANCHOO

Sworn to before me this
 22nd day of May, 2008

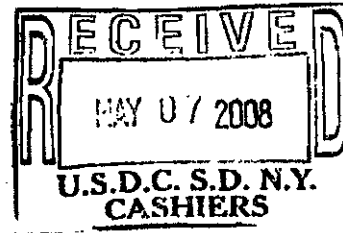

 Notary Public
 Michael C. Zeale
 Notary Public State of New Jersey
 My Commission Expires
 August 8, 2010

¹ Due to the bank transfer charges there is a small difference in the dollar value of the amount shown on the SWIFT versus the corresponding EFT restrained by the intermediary bank.

EXHIBIT 1

08 CV 4328

BLANK ROME LLP
Attorneys for Plaintiff
THE SHIPPING CORPORATION OF INDIA LTD.
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
The Chrysler Building
New York, NY 10174
(212) 885-5000



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE SHIPPING CORPORATION OF INDIA
LTD.,

Plaintiff,

-against-

JALDHI OVERSEAS PTE LTD.,

Defendant.

08 Civ.

VERIFIED COMPLAINT

Plaintiff, THE SHIPPING CORPORATION OF INDIA LTD. ("Plaintiff") by its attorneys Blank Rome LLP, complaining of the above-named Defendant JALDHI OVERSEAS PTE LTD. ("Defendant"), alleges upon information and belief as follows:

1. This is a case of admiralty and maritime jurisdiction, as hereinafter more fully appears, and is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. The Court has subject matter jurisdiction. This action is also brought pursuant to 9 U.S.C. § 8 in respect of a London arbitration.

2. At all material times, Plaintiff was and now is a foreign company organized and existing under the laws of India and the owner of the "M/V Rishikeshi" (the "Vessel").

3. At all material times, Defendant was and now is a corporation organized and existing under the laws of Singapore.

THE BASIC FACTS

4. Plaintiff, pursuant to a charter party dated March 12, 2008 (the "Charter") chartered the Vessel to Defendant.

5. Defendant failed to any pay hire as required by the Charter and amounts owing for bunkers (fuel oil).

6. Plaintiff has issued a hire statement dated May 2, 2008 showing the amounts due and owing in the sum of \$3,608,445, attached as Exhibit 1 to the accompanying Rule B affidavit.

7. The Charter is subject to English law and London arbitration. This action is filed without prejudice to such right of arbitration.

COUNT I

RULE B RELIEF

8. Plaintiff repeats paragraphs 1 through 7 as if fully set forth herein.

9. Plaintiff seeks issuance of process of maritime attachment so that it may obtain security for its claim including its English attorneys' fees and arbitrators' fees.

A. On the principal claim	\$3,608,445
B. Interest on Claim at 7% over 3 years:	\$ 757,773
C. Estimated lawyers and arbitrators' fees and costs	<u>\$ 450,000</u>
TOTAL:	\$4,816,218

10. Defendant cannot be found within this district within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal

Rules of Civil Procedure ("Rule B"), but is believed to have, or will have during the pendency of this action, assets in this jurisdiction.

WHEREFORE, Plaintiff prays:

A. That process in due form of law issue against Defendant, citing it to appear and answer under oath all and singular the matters alleged in the Verified Complaint;


B. That since Defendant cannot be found within this District pursuant to Rule B, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B attaching all of Defendant tangible or intangible property or any other funds held by any garnishee, which are due and owing to Defendant up to the amount of \$4,816,218 to secure the Plaintiff's claims, and that all persons claiming any interest in the same be cited to appear and, pursuant to Rule B, answer the matters alleged in the Verified Complaint;

C. That this Court retain jurisdiction over this matter through the entry of a judgment or award associated with the pending claims including appeals thereof.

D. That Plaintiff may have such other, further and different relief as may be just and proper.

Dated: New York, NY
May 7, 2008

Respectfully submitted,
BLANK ROME LLP
Attorneys for Plaintiff

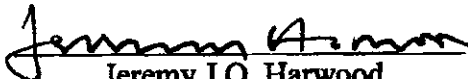
By 
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
New York, NY 10174
Tel.: (212) 885-5000

VERIFICATION

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

Jeremy J.O. Harwood, being duly sworn, deposes and says:

1. I am a member of the bar of this Honorable Court and of the firm of Blank Rome LLP, attorneys for Plaintiff.
2. I have read the foregoing Complaint and I believe the contents thereof are true.
3. The reason this Verification is made by deponent and not by Plaintiff is that Plaintiff is a foreign corporation, no officer or director of which is within this jurisdiction.
4. The sources of my information and belief are documents provided to me and statements made to me by representatives of Plaintiff.


Jeremy J.O. Harwood

Sworn to before me this
7th day of May, 2008


Notary Public

KARL V. REDA
Notary Public, State of New York
No. 30-4783126, C. of. in Nassau Cty.
Certificate Filed in New York County
Commission Expires **Nov. 30, 2009**

BLANK ROME LLP
Attorneys for Plaintiff
THE SHIPPING CORPORATION OF INDIA LTD.
Jeremy J. O. Harwood (JH 9012)
The Chrysler Building
405 Lexington Avenue
New York, NY 10174-0208
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE SHIPPING CORPORATION OF INDIA
LTD.

Plaintiff,

-against-

JALDHI OVERSEAS PTE LTD.,
Defendant.

08 Civ.

**AFFIDAVIT PURSUANT TO
SUPPLEMENTAL RULE B**

STATE OF NEW YORK)
 : ss:
COUNTY OF NEW YORK)

Jeremy J. O. Harwood, being duly sworn, deposes and says:

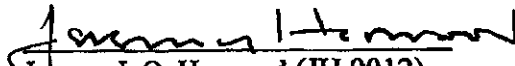
1. I am a member of the Bar of this Honorable Court and a member of the firm of Blank Rome LLP, attorneys for the Plaintiff herein. I am familiar with the circumstances of the Verified Complaint and submit this affidavit in support of Plaintiff's request for the issuance of Process of Maritime Attachment and Garnishment of the property of defendant JALDHI OVERSEAS PTE LTD. ("Defendant"), a foreign corporation, pursuant to Supplemental Rule B For Certain Admiralty and Maritime Claims of the Federal Rules of the Federal Rules of Civil Procedure.

2. Defendant is a party to the maritime contract of charter party on which this claim is based, and is a foreign corporation or other business entity organized and existing under the laws of Singapore or another foreign jurisdiction.

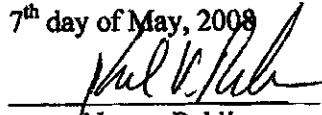
3. Under my supervision, my office conducted a search of the New York State Secretary of State, Division of Corporations, the 2008 Transportation Tickler, telephone assistance, and a general internet search.

4. In our search, we did not find any listing or reference to Defendant in this judicial district or the state of New York. In the circumstances, I believe Defendant cannot be found within this district.

5. I attach as Exhibit 1 hereto a true copy of Plaintiff's hire statement.


Jeremy J. O. Harwood (JH 9012)

Sworn to before me this
7th day of May, 2008


Notary Public

KARL V. REDA
Notary Public, State of New York
No. 30-4783126, Qual. in Nassau Cty.
Certificate Filed in New York County
Commission Expires: Nov. 30, 2009

EXHIBIT 1



(भारत सरकार का उपक्रम)

बल्क कैरियर ऐंड टैंकर प्रभाग, 250, सुदाम काकु अहिरे मार्ग, बरली, मुंबई - 400 025.

The Shipping Corporation Of India Ltd.

(A Government of India Undertaking)

BULK CARRIER & TANKER DIVISION

Phone : 2493 7484 / 2493 7473

250, Sudam Kaku Ahire Marg, Worli, Mumbai - 400 025.

Telex No.: 011 - 76458 / 76459 / 76492 / 71547

Cable : TLX - 76458 SHIPINDIA, Worli, Mumbai

Fax : 0091-22-2493 7474 / 2497 9560 / 2493 8642

TO
M/S JALDHI OVERSEAS PTE. LTD.
SINGAPORE

THROUGH: M/S GLOBUS MARINE
FAX # 0124-4158201

FLWG. FOR CHRTRS. M/S JALDHI

ENCLOSED PL FIND OWNERS PFHS INDICATING AMOUNT US\$ 3608445.00 DUE FM CHRTRS.
CHRTRS. REQUESTED TO CONFIRM SAME AND ARRANGE REMIT BALANCE (.) PL ADVISE
REMITTANCE DETAILS, ENABLE US TRACE FUNDS (.)

M.V. RISHIKESH/ JALDHI C.P. DT. 12.03.2008DEBIT NOTE FOR 3RD HIRE

BC/4756

DATE : 02-May-08

					AMT. IN USD	
SNO.	PARTICULARS				DEBIT	CREDIT
1	GROSS HIRE					
	FROM :	29-Mar-08	01:30	Z		
	TO :	13-May-08	01:30	Z		
	I.E. DAYS	45.000000	@ USD	80000.00	3600000.00	
2	3.75% AD. COMMISSION					135000.00
3	ESTIMATED CONSUMABLE BUNKERS UPTO S'PORE					
	IFO(MT)	185.500	* US\$ =	480.000	80895.00	
	MDO(MT)	55.000	* US\$ =	920.000	50800.00	
4	C/VIE @ USD 1300/- PMPR				1950.00	
5	AMOUNT RECEIVED					0.00
	USD					
6	BALANCE DUE TO OWNERS					3608445.00
7	TOTAL				3743445.00	3743445.00

E.&O.E

कुले भारतीय शिपिंग कॉर्पोरेशन लिमिटेड
FOR THE SHIPPING CORPORATION OF INDIA LTD

R Kamath 02/05/08
रवीश कर्माकर/RAVISH KARMAT
जॉइंट मैनेजर/Jt. Manager

पंजीकृत कार्यालय : शिपिंग हाऊस, 245, मैडम कामा रोड, मुंबई - 400 021.
Registered Office : Shipping House, 245, Madame Cama Road, Mumbai - 400 021.

EXHIBIT 2

BLANK ROME LLP
Attorneys for Plaintiff
THE SHIPPING CORPORATION OF INDIA LTD.
Jeremy J.O. Harwood (JH 9012)
The Chrysler Building
405 Lexington Avenue
New York, NY 10174-0208
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

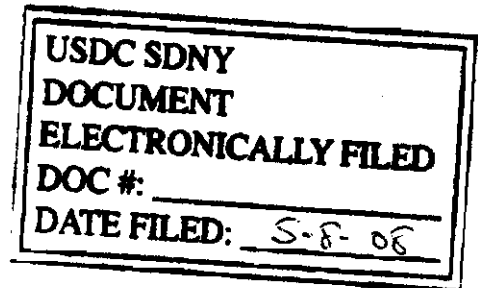
THE SHIPPING CORPORATION OF INDIA
LTD.,

Plaintiff,

-against-

JALDHI OVERSEAS PTE LTD.,

Defendant.



08 Civ. 4328 (JSR)

**ORDER DIRECTING CLERK
TO ISSUE PROCESS OF
MARITIME ATTACHMENT
AND GARNISHMENT**

EX PARTE ORDER FOR PROCESS OF MARITIME ATTACHMENT

WHEREAS, on May 7, 2008, Plaintiff, THE SHIPPING CORPORATION OF INDIA LTD., filed a Verified Complaint herein for damages amounting to \$4,816,218 inclusive of interest, costs and reasonable attorney's fees, and praying for issuance of Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Admiralty Rules for Certain Admiralty and Maritime Claims of the Federal Rules and Civil Procedure; and,

WHEREAS, the Process of Maritime Attachment and Garnishment would command that the United States Marshal or other designated process server attach any and all of the Defendant's property within the District of this Court; and,

WHEREAS, the Court has reviewed the Verified Complaint and the Supporting Affidavit, and the conditions of Supplemental Admiralty Rule B appearing to exist, it is hereby,

ORDERED, that Process of Maritime Attachment and Garnishment shall issue to the garnishees named in Schedule A hereto, against all tangible or intangible property belonging to, claimed by or being held for the Defendant by any garnishees within this District, including but not limited to electronic fund transfers originated by, payable to, or otherwise for the benefit of Defendant, whether to or from the garnishee banks or any other electronic fund transfers, in an amount of up to \$4,816,218 pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure; and, it is further,

ORDERED, that any person claiming an interest in the property attached or garnished pursuant to said Order shall, upon application to the Court, be entitled to a prompt hearing at which the Plaintiff shall be required to show why the attachment and garnishment should not be vacated or other relief granted; and it is further,

ORDERED, that supplemental process specifying other or additional garnishees enforcing the Court's Order may be issued by the Clerk upon application without further Order of the Court; and it is further,

ORDERED, that following initial service by the United States Marshal or other designated process server upon each garnishee, supplemental service of the Process of Maritime Attachment and Garnishment, as well as this Order, may be made by way of facsimile transmission or e-mail and, it is further,

ORDERED, that service on any garnishee as described above is deemed continuous throughout the day from the time of such service through the opening of the garnishee's business the next business day and, it is further,

ORDERED, that pursuant to Federal Rule of Civil Procedure 5(b)(2)(D), each garnishee may consent, in writing, to accept service by any other means; and, it is further,

ORDERED, that a copy of this Order be attached to and served with the said Process of Maritime Attachment and Garnishment.

Dated: May 7, 2008

SO ORDERED:


U.S.D.J.

SCHEDULE A

1. The Bank of New York
2. Bank of America
3. JP Morgan Chase
4. ABN Amro Bank
5. American Express Bank
6. Barclay's Bank
7. BNP Paribas
8. Citibank
9. Deutsche Bank and/or Deutsche Bank Trust Co. Americas
10. Dresdner Bank AG
11. HSBC Bank USA
12. Wachovia Bank, N.A. - New York
13. UBS

EXHIBIT 3

From: Harwood, Jeremy J.O. [jharwood@BlankRome.com]
Sent: Wednesday, May 14, 2008 2:25 PM
To: rwanchoo@wanchoolaw.com
Subject: FW: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

Kindly accept this as Local Rule notice of the attachments referenced below - thank you .

Jeremy J.O. Harwood | Blank Rome LLP

The Chrysler Building, 405 Lexington Avenue | New York, NY 10174-0208
Phone: 212.885.5149 | Fax: 917.332.3720 | Email: JHarwood@BlankRome.com

From: Kenneth Manyin [mailto:KManyin@rawle.com]
Sent: Wednesday, May 14, 2008 2:17 PM
To: Harwood, Jeremy J.O.
Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian
Subject: RE: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

Not a problem. We'll advise the bank accordingly.

- Ken

-----Original Message-----

From: Harwood, Jeremy J.O. [mailto:jharwood@BlankRome.com]
Sent: Wednesday, May 14, 2008 1:58 PM
To: Kenneth Manyin
Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian
Subject: RE: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

We agree to that proposal - thanks for doing the calculations for us - we have not been advised of attachments other than by you . Neal please now do a cease and desist for all future attachments , many thanks all

Jeremy J.O. Harwood | Blank Rome LLP

The Chrysler Building, 405 Lexington Avenue | New York, NY 10174-0208
Phone: 212.885.5149 | Fax: 917.332.3720 | Email: JHarwood@BlankRome.com

From: Kenneth Manyin [mailto:KManyin@rawle.com]
Sent: Wednesday, May 14, 2008 1:55 PM
To: Harwood, Jeremy J.O.
Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian
Subject: RE: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

In lieu of directing restraint of all of these funds, with subsequent release, please consider this proposal.

As of now, we are aware that you have restrained \$2,377,533.90 and \$282,726.35, for a total of

\$2,660,260.20.

The Ex Parte Order allows for the restraint of up to \$4,816,218.00. If you have not restrained any funds other than the \$2,660,260.20, then you are entitled to restrain up to another \$2,155,957.80.

This amount can be satisfied by restraining the wires for \$1,399,960.00 + \$449,960.00 + \$269,363.72 as well as \$36,674.18 of the wire for \$93,861.10. In such case the entire sum of the wire for \$999,960.00 can be released and transferred according to the original bank instructions, as can \$57,186.12 of the wire for \$93,861.10.

This proposal assumes that you have not restrained any funds besides those from the two wires at Bank of New York Mellon referred to above.

Please let us know if you are in agreement with this proposal, or if you have an alternative request.

-----Original Message-----

From: Harwood, Jeremy J.O. [mailto:jharwood@BlankRome.com]

Sent: Wednesday, May 14, 2008 1:32 PM

To: Kenneth Manyin

Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian

Subject: RE: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

Yes - for now - it looks like we are over-secured so will get back to you on the sum to release shortly

Jeremy J.O. Harwood | Blank Rome LLP

The Chrysler Building, 405 Lexington Avenue | New York, NY 10174-0208

Phone: 212.885.5149 | Fax: 917.332.3720 | Email: JHarwood@BlankRome.com

From: Kenneth Manyin [mailto:KManyin@rawle.com]

Sent: Wednesday, May 14, 2008 1:14 PM

To: Harwood, Jeremy J.O.

Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian

Subject: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

Jeremy,

Please be advised that five wires have come through the Bank of New York Mellon today. In all but one instance, with the exception being noted below, the funds are being transferred to Jaldhi Overseas PTE Limited, 101 Cecil Street, No. 08-06, Tong Eng Building, Singapore. The wires are as follows:

1. \$ 269,363.72
2. \$ 999,960.00
3. \$ 449,960.00
4. \$1,399,960.00
5. \$ 93,861.10 (reference to the Tong Eng Building was omitted from the address for Jaldhi)

Kindly advise whether any of these funds should be restrained pursuant to the Writ of Maritime Attachment served on the bank by you in the above referenced matter.

Very truly yours,

Kenneth R. Manyin, Esquire
RAWLE & HENDERSON, LLP
The Widener Building
One South Penn Square
Philadelphia, PA 19107
(215) 575-4216

This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, is prohibited and may be unlawful.

EXHIBIT 4

BLANK ROME LLP
Attorneys for Plaintiff
THE SHIPPING CORPORATION OF INDIA LTD.
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
The Chrysler Building
New York, NY 10174
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE SHIPPING CORPORATION OF INDIA
LTD.,

Plaintiff,

-against-

JALDHI OVERSEAS PTE LTD.,

Defendant.

08 Civ. 4328 (JSR)

AMENDED VERIFIED COMPLAINT

Plaintiff, THE SHIPPING CORPORATION OF INDIA LTD. ("Plaintiff") by its attorneys Blank Rome LLP, complaining of the above-named Defendant JALDHI OVERSEAS PTE LTD. ("Defendant"), alleges upon information and belief as follows:

1. This is a case of admiralty and maritime jurisdiction, as hereinafter more fully appears, and is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. The Court has subject matter jurisdiction. This action is also brought pursuant to 9 U.S.C. § 8 in respect of a London arbitration.

2. At all material times, Plaintiff was and now is a foreign company organized and existing under the laws of India and the owner of the "M/V Rishikeshi" (the "Vessel").

3. At all material times, Defendant was and now is a corporation organized and existing under the laws of Singapore.

THE BASIC FACTS

4. Plaintiff, pursuant to a charter party dated March 12, 2008 (the "Charter") chartered the Vessel to Defendant.

5. Plaintiff had issued a hire statement dated May 2, 2008 showing the amounts due and owing in the sum of \$3,608,445, attached as Exhibit 1 to the accompanying Rule B affidavit.

6. Defendant failed to any pay hire as required by the Charter and amounts owing for bunkers (fuel oil).

7. On or about May 7, 2008 Defendant paid a first hire installment of \$1,260,585.

8. Since the date of the filing of the original complaint on May 7, 2008 a fourth hire statement, dated May 13, 2008 was issued which credits the prior payment and shows a balance owing of \$3,503,610. A true copy is Exhibit 2 hereto.

9. On or about May 14, 2008 Plaintiff's counsel was advised by email by counsel for garnishee banks that the amount originally sought to be attached of \$4,816,218 has been attached at various banks. A true copy of the communication is Exhibit 3 hereto.

10. The purpose of this amendment is to include the amounts claimed in the May 13, 2008 invoice as sums sought to be attached and to credit the payment on or

about May 7, 2008, thereby reducing the sum sought to be attached or that has been attached by \$126,970, as set out below.

11. The Charter is subject to English law and London arbitration. This action is filed without prejudice to such right of arbitration.

COUNT I

RULE B RELIEF

12. Plaintiff repeats paragraphs 1 through 11 as if fully set forth herein.

13. Plaintiff seeks issuance of process of maritime attachment so that it may obtain security for its claim including its English attorneys' fees and arbitrators' fees.

A. On the principal claim	\$3,503,510
B. Interest on Claim at 7% over 3 years:	\$ 735,737
C. Estimated lawyers and arbitrators' fees and costs	<u>\$ 450,000</u>
TOTAL:	\$4,689,247

14. Defendant cannot be found within this district within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure ("Rule B"), but is believed to have, or will have during the pendency of this action, assets in this jurisdiction.

WHEREFORE, Plaintiff prays:

A. That process in due form of law issue against Defendant, citing it to appear and answer under oath all and singular the matters alleged in the Verified Complaint;

B. That since Defendant cannot be found within this District pursuant to Rule B, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B attaching all of Defendant tangible or intangible property or any other funds held by any garnishee, which are due and owing to

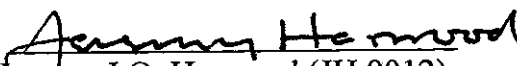
Defendant up to the amount of \$4,816,218 to secure the Plaintiff's claims, and that all persons claiming any interest in the same be cited to appear and, pursuant to Rule B, answer the matters alleged in the Verified Complaint;

C. That this Court retain jurisdiction over this matter through the entry of a judgment or award associated with the pending claims including appeals thereof.

D. That Plaintiff may have such other, further and different relief as may be just and proper.

Dated: New York, NY
May 14, 2008

Respectfully submitted,
BLANK ROME LLP
Attorneys for Plaintiff

By 
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
New York, NY 10174
Tel.: (212) 885-5000

VERIFICATION

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

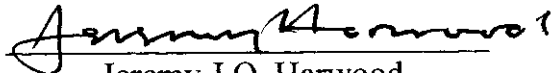
Jeremy J.O. Harwood, being duly sworn, deposes and says:

1. I am a member of the bar of this Honorable Court and of the firm of Blank Rome LLP, attorneys for Plaintiff.

2. I have read the foregoing Complaint and I believe the contents thereof are true.

3. The reason this Verification is made by deponent and not by Plaintiff is that Plaintiff is a foreign corporation, no officer or director of which is within this jurisdiction.

4. The sources of my information and belief are documents provided to me and statements made to me by representatives of Plaintiff.


Jeremy J.O. Harwood

Sworn to before me this
14th day of May, 2008


Notary Public

KARL V. REDA
Notary Public, State of New York
No. 30-4783126, Qual. in Nassau Cty.
Certificate Filed in New York County
Commission Expires

NOV. 30, 2009

EXHIBIT 1



(भारत सरकार का उपक्रम)

बल्क कैरियर एंड टैंकर प्रभाग, 250, सुदाम कालू अहिरे मार्ग, वरली, मुंबई - 400 025.

The Shipping Corporation Of India Ltd.

(A Government of India Undertaking)

BULK CARRIER & TANKER DIVISION

Phone : 2493 7484 / 2493 7473

250, Sudam Kahu Ahire Marg, Worli, Mumbai - 400 025.

Telex No.: 011 - 76458 / 76459 / 76492 / 71547

Cable : TLX - 76458 SHIPINDIA, Worli, Mumbai

Fax : 0091-22-2493 7474 / 2497 3560 / 2493 5642

TO

M/S JALDHI OVERSEAS PTE. LTD.
SINGAPORE

THOROUGH: M/S GLOBUS MARINE

FAX # 0124 - 4159201

FLWG. FOR CHRTRS. M/S JALDHI

ENCLOSED PL FIND OWNERS PFHS INDICATING AMOUNT US\$ 3608445.00 DUE FM CHRTRS.
CHRTRS. REQUESTED TO CONFIRM SAME AND ARRANGE REMIT BALANCE (.) PL ADVISE
REMITTANCE DETAILS. ENABLE US TRACE FUNDS (.)M.V. RISHIKESH/ JALDHI C.P. DT. 12.03.2008DEBIT NOTE FOR 3RD HIREBC/4758

DATE : 02-May-08

SNO.	PARTICULARS	AMT. IN USD	
		DEBIT	CREDIT
1	GROSS HIRE		
	FROM : 29-Mar-08 01:30 Z		
	TO : 13-May-08 01:30 Z		
	I.E. DAYS 45.000000 @ USD 80000.00	3600000.00	
2	3.75% AD. COMMISSION		135000.00
3	ESTIMATED CONSUMABLE BUNKERS UPTO S'PORE		
	IFO(MT) 185.500 * US\$ = 490.000	90895.00	
	MDO(MT) 55.000 * US\$ = 920.000	50600.00	
4	C/V/E @ USD 1300/- PMPR	1950.00	
5	AMOUNT RECEIVED USD		0.00
6	BALANCE DUE TO OWNERS		3608445.00
7	TOTAL	3743445.00	3743445.00

E&O.E

कृते भारतीय नौवहन निगम लिमिटेड
For THE SHIPPING CORPORATION OF INDIA LTD.रिधीमा कामत/RIDHIMA KAMAT
वरिष्ठ प्रबन्धक/Sr. Manager

पंजीकृत कार्यालय: शिपिंग हाऊस, 245, मेडम कामा रोड, मुम्बई - 400 021.

Registered Office : Shipping House, 245, Madame Cama Road, Mumbai - 400 021.

EXHIBIT 2



(भारत सरकार का उपक्रम)

बल्क कैरियर ऐंड टैंकर प्रभाग, 250, सुदाम कालू अहिरे मार्ग, वरली, मुंबई - 400 025.

The Shipping Corporation Of India Ltd.(A Government of India Undertaking)
BULK CARRIER & TANKER DIVISION
Phone : 2493 7484 / 2493 7473250, Sudam Kalu Ahire Marg, Worli, Mumbai - 400 025.
Telex No.: 011 - 76458 / 76459 / 76492 / 71547
Cable : TLX - 76458 SHIPINDIA, Worli, Mumbai
Fax : 0091-22-2493 7474 / 2497 3560 / 2493 5642

BY FAX

M/S JALDHI OVERSEAS PTE LTD.,
SINGAPORE

THRU M/S GLOBUS MARINE - FAX NO. 0124 4159201

FLWG FOR CHRTRS M/S JALDHI

ENCLOSED PLS FIND OWNERS NEXT CHARTER HIRE INVOICE (INCLUDING THE UNPAID HIRE)
INDICATING AMT US\$ 3503510/- DUE FROM CHARTERERS.
CHARTERERS ARE REQUESTED TO CONFIRM SAME AND ARRANGE REMIT BALANCE.
PLS ADVISE REMITTANCE DETAILS ENABLE US TRACE FUNDS.**DEBIT NOTE**

13-May-08

M.V.RISHIKESH / JALDHI C/P DTD.12.03.2008DEBIT NOTE FOR 4TH HIRE

BC/4756

SR NO	PARTICULARS			OWNERS	CHARTERERS
				US\$	US\$
1	CHARTER PERIOD				
	FROM	29-Mar-08	1.30 Z		
	TO	28-May-08	1.30 Z		
	(E. DAYS	60.00			
	NET HIRE	60.00 DAYS @ US\$	80000.00	4800000.00	
2	ESTIMATED CONSUMABLE BUNKERS UPTO S'PORE				
	IFO (MT)	185.50	US\$/PMT	490.00	90895.00
	MDO (MT)	55.00	US\$/PMT	920.00	50600.00
3	AD COMM 3.75%				180000.00
3	C/VIE/	US\$	1300.00	PMPR	2600.00
4	AMT RECEIVED ON 07.05.2008				1260585.00
5	BALANCE DUE TO SCI				3503510.00
				4944095.00	4944095.00

E. & O.E.

कुते भारतीय नौवहन निगम लिमिटेड
For THE SHIPPING CORPORATION OF INDIA LTD.लक्ष्मण एम.जी. / Lakshman M. G.
वरली प्रभाग / Senior Manager

पंजीकृत कार्यालय: शिपिंग हाऊस, 245, मेडम कामा रोड, मुम्बई - 400 021.

Registered Office : Shipping House, 245, Madame Cama Road, Mumbai - 400 021.

EXHIBIT 3

Harwood, Jeremy J.O.

From: Kenneth Manyin [KManyin@rawle.com]
Sent: Wednesday, May 14, 2008 2:17 PM
To: Harwood, Jeremy J.O.
Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian
Subject: RE: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

Not a problem. We'll advise the bank accordingly.

- Ken

-----Original Message-----

From: Harwood, Jeremy J.O. [mailto:jharwood@BlankRome.com]
Sent: Wednesday, May 14, 2008 1:58 PM
To: Kenneth Manyin
Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian
Subject: RE: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

We agree to that proposal - thanks for doing the calculations for us - we have not been advised of attachments other than by you . Neal please now do a cease and desist for all future attachments , many thanks all

Jeremy J.O. Harwood | Blank Rome LLP
The Chrysler Building, 405 Lexington Avenue | New York, NY 10174-0208
Phone: 212.885.5149 | Fax: 917.332.3720 | Email: JHarwood@BlankRome.com

From: Kenneth Manyin [mailto:KManyin@rawle.com]
Sent: Wednesday, May 14, 2008 1:55 PM
To: Harwood, Jeremy J.O.
Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian
Subject: RE: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

In lieu of directing restraint of all of these funds, with subsequent release, please consider this proposal.

As of now, we are aware that you have restrained \$2,377,533.90 and \$282,726.35, for a total of \$2,660,260.20.

The Ex Parte Order allows for the restraint of up to \$4,816,218.00. If you have not restrained any funds other than the \$2,660,260.20, then you are entitled to restrain up to another \$2,155,957.80.

This amount can be satisfied by restraining the wires for \$1,399,960.00 + \$449,960.00 + \$269,363.72 as well as \$36,674.18 of the wire for \$93,861.10. In such case the entire sum of the wire for \$999,960.00 can be released and transferred according to the original bank instructions, as can \$57,186.12 of the wire for \$93,861.10.

5/14/2008

This proposal assumes that you have not restrained any funds besides those from the two wires at Bank of New York Mellon referred to above.

Please let us know if you are in agreement with this proposal, or if you have an alternative request.

-----Original Message-----

From: Harwood, Jeremy J.O. [mailto:jharwood@BlankRome.com]

Sent: Wednesday, May 14, 2008 1:32 PM

To: Kenneth Manyin

Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian

Subject: RE: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

Yes - for now - it looks like we are over-secured so will get back to you on the sum to release shortly

Jeremy J.O. Harwood | Blank Rome LLP

The Chrysler Building, 405 Lexington Avenue | New York, NY 10174-0208

Phone: 212.885.5149 | Fax: 917.332.3720 | Email: JHarwood@BlankRome.com

From: Kenneth Manyin [mailto:KManyin@rawle.com]

Sent: Wednesday, May 14, 2008 1:14 PM

To: Harwood, Jeremy J.O.

Cc: Mitchell, Neal; Carl Buchholz; Kevin McGee; Lilian Philiposian

Subject: THE SHIPPING CORPORATION OF INDIA, LTD. V. JALDHI OVERSEAS PTE. LTD, SDNY 08-4328 (BNY574)

Jeremy,

Please be advised that five wires have come through the Bank of New York Mellon today. In all but one instance, with the exception being noted below, the funds are being transferred to Jaldhi Overseas PTE Limited, 101 Cecil Street, No. 08-06, Tong Eng Building, Singapore. The wires are as follows:

1. \$ 269,363.72
2. \$ 999,960.00
3. \$ 449,960.00
4. \$1,399,960.00
5. \$ 93,861.10 (reference to the Tong Eng Building was omitted from the address for Jaldhi)

Kindly advise whether any of these funds should be restrained pursuant to the Writ of Maritime Attachment served on the bank by you in the above referenced matter.

Very truly yours,

Kenneth R. Manyin, Esquire
RAWLE & HENDERSON, LLP
The Widener Building
One South Penn Square
Philadelphia, PA 19107

5/14/2008

(215) 575-4216

This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, is prohibited and may be unlawful.

EXHIBIT 5

Rahul Wanchoo

From: Rahul Wanchoo [rwanchoo@wanchoolaw.com]
Sent: Friday, May 16, 2008 11:16 AM
To: 'Harwood, Jeremy J.O.'
Subject: SCI v. Jaldhi Overseas

Dear Jeremy,

SCI's London solicitor has advised my counterpart that any funds attached in excess of the security sought in SCI's Amended Verified Complaint in the amount of \$4,689,247.00 have been released to Jaldhi. Please confirm if this has been done. Thanks.

Best regards,

Rahul Wanchoo
Law Offices of Rahul Wanchoo
Phone:(646) 593-8866
Fax: (212) 618-0213
Mobile:(201) 694-5235
E-mail: rwanchoo@wanchoolaw.com
Web site: www.wanchoolaw.com

CONFIDENTIALITY NOTICE

THE INFORMATION AND MATERIAL CONTAINED IN THIS E-MAIL MESSAGE ARE INTENDED ONLY FOR THE USE OF THE ADDRESSEE AND MAY BE PRIVILEGED AND CONFIDENTIAL ATTORNEY COMMUNICATION. PERSONS RESPONSIBLE FOR DELIVERING THIS COMMUNICATION TO THE INTENDED RECIPIENT ARE INSTRUCTED NOT TO DISCLOSE, COPY OR DISTRIBUTE THIS COMMUNICATION AND ARE NOT AUTHORIZED TO TAKE ANY ACTION WITH RESPECT TO IT OTHER THAN TO ASSURE ITS PROPER DELIVERY TO THE PERSON TO WHOM IT IS ADDRESSED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE TO ARRANGE FOR ITS PROPER RETURN OR DESTRUCTION.

Rahul Wanchoo

From: Harwood, Jeremy J.O. [jharwood@BlankRome.com]
Sent: Friday, May 16, 2008 11:31 AM
To: Rahul Wanchoo
Cc: Mitchell, Neal; Harwood, Jeremy J.O.
Subject: RE: SCI v. Jaldhi Overseas

Dear Rahul - I assume you understood what we discussed last night with the judge's law clerk - namely that if as you proposed to her to seek to vacate the attachment in whole or in part based on the originator / beneficiary distinction then , as I stated , we would immediately withdraw our cease and desist and start daily service on the banks seeking to attach funds originating from your client and to the extent successful release those funds dollar for dollar that we have have attached going to Jaldhi . If prior to your statement last night we released any funds originating by Jaldhi kindly advise . Best regards

Jeremy J.O. Harwood | Blank Rome LLP

The Chrysler Building, 405 Lexington Avenue | New York, NY 10174-0208
Phone: 212.885.5149 | Fax: 917.332.3720 | Email: JHarwood@BlankRome.com

From: Rahul Wanchoo [mailto:rwanchoo@wanchoolaw.com]
Sent: Friday, May 16, 2008 11:16 AM
To: Harwood, Jeremy J.O.
Subject: SCI v. Jaldhi Overseas

Dear Jeremy,

SCI's London solicitor has advised my counterpart that any funds attached in excess of the security sought in SCI's Amended Verified Complaint in the amount of \$4,689,247.00 have been released to Jaldhi. Please confirm if this has been done. Thanks.

Best regards,

Rahul Wanchoo
Law Offices of Rahul Wanchoo
Phone:(646) 593-8866
Fax: (212) 618-0213
Mobile:(201) 694-5235
E-mail: rwanchoo@wanchoolaw.com
Web site: www.wanchoolaw.com

CONFIDENTIALITY NOTICE

THE INFORMATION AND MATERIAL CONTAINED IN THIS E-MAIL MESSAGE ARE INTENDED ONLY FOR THE USE OF THE ADDRESSEE AND MAY BE PRIVILEGED AND CONFIDENTIAL ATTORNEY COMMUNICATION. PERSONS RESPONSIBLE FOR DELIVERING THIS COMMUNICATION TO THE INTENDED RECIPIENT ARE INSTRUCTED NOT TO DISCLOSE, COPY OR DISTRIBUTE THIS COMMUNICATION AND ARE NOT AUTHORIZED TO TAKE ANY ACTION WITH RESPECT TO IT OTHER THAN TO ASSURE ITS PROPER DELIVERY TO THE PERSON TO WHOM IT IS ADDRESSED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE TO ARRANGE FOR ITS PROPER RETURN OR DESTRUCTION.

Rahul Wanchoo

From: Rahul Wanchoo [rwanchoo@wanchoolaw.com]
Sent: Friday, May 16, 2008 12:05 PM
To: 'Harwood, Jeremy J.O.'
Subject: RE: SCI v. Jaldhi Overseas

Dear Jeremy,

That does not answer my question. All I am trying to determine is if SCI is holding on to funds in excess of the amount authorized by the Court's amended ex parte order of attachment in the amount of \$4,689,247.00, and, if so, does SCI intend to release these funds or not so that I may report same to my client.

Best regards,

Rahul Wanchoo
Law Offices of Rahul Wanchoo
Phone: (646) 593-8866
Fax: (212) 618-0213
Mobile: (201) 694-5235
E-mail: rwanchoo@wanchoolaw.com
Web site: www.wanchoolaw.com

CONFIDENTIALITY NOTICE

THE INFORMATION AND MATERIAL CONTAINED IN THIS E-MAIL MESSAGE ARE INTENDED ONLY FOR THE USE OF THE ADDRESSEE AND MAY BE PRIVILEGED AND CONFIDENTIAL ATTORNEY COMMUNICATION. PERSONS RESPONSIBLE FOR DELIVERING THIS COMMUNICATION TO THE INTENDED RECIPIENT ARE INSTRUCTED NOT TO DISCLOSE, COPY OR DISTRIBUTE THIS COMMUNICATION AND ARE NOT AUTHORIZED TO TAKE ANY ACTION WITH RESPECT TO IT OTHER THAN TO ASSURE ITS PROPER DELIVERY TO THE PERSON TO WHOM IT IS ADDRESSED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE TO ARRANGE FOR ITS PROPER RETURN OR DESTRUCTION.

From: Harwood, Jeremy J.O. [mailto:jharwood@BlankRome.com]
Sent: Friday, May 16, 2008 11:31 AM
To: Rahul Wanchoo
Cc: Mitchell, Neal; Harwood, Jeremy J.O.
Subject: RE: SCI v. Jaldhi Overseas

Dear Rahul - I assume you understood what we discussed last night with the judge's law clerk - namely that if as you proposed to her to seek to vacate the attachment in whole or in part based on the originator / beneficiary distinction then , as I stated , we would immediately withdraw our cease and desist and start daily service on the banks seeking to attach funds originating from your client and to the extent successful release those funds dollar for dollar that we have have attached going to Jaldhi . If prior to your statement last night we released any funds originating by Jaldhi kindly advise . Best regards

Jeremy J.O. Harwood | Blank Rome LLP
The Chrysler Building, 405 Lexington Avenue | New York, NY 10174-0208
Phone: 212.885.5149 | Fax: 917.332.3720 | Email: JHarwood@BlankRome.com

Rahul Wanchoo

From: Harwood, Jeremy J.O. [jharwood@BlankRome.com]
Sent: Friday, May 16, 2008 1:38 PM
To: Rahul Wanchoo
Subject: RE: SCI v. Jaldhi Overseas

How about answering mine ?

Jeremy J.O. Harwood | Blank Rome LLP

The Chrysler Building, 405 Lexington Avenue | New York, NY 10174-0208
Phone: 212.885.5149 | Fax: 917.332.3720 | Email: JHarwood@BlankRome.com

From: Rahul Wanchoo [mailto:rwanchoo@wanchoolaw.com]
Sent: Friday, May 16, 2008 12:05 PM
To: Harwood, Jeremy J.O.
Subject: RE: SCI v. Jaldhi Overseas

Dear Jeremy,

That does not answer my question. All I am trying to determine is if SCI is holding on to funds in excess of the amount authorized by the Court's amended ex parte order of attachment in the amount of \$4,689,247.00, and, if so, does SCI intend to release these funds or not so that I may report same to my client.

Best regards,

Rahul Wanchoo
Law Offices of Rahul Wanchoo
Phone: (646) 593-8866
Fax: (212) 618-0213
Mobile: (201) 694-5235
E-mail: rwanchoo@wanchoolaw.com
Web site: www.wanchoolaw.com

CONFIDENTIALITY NOTICE

THE INFORMATION AND MATERIAL CONTAINED IN THIS E-MAIL MESSAGE ARE INTENDED ONLY FOR THE USE OF THE ADDRESSEE AND MAY BE PRIVILEGED AND CONFIDENTIAL ATTORNEY COMMUNICATION. PERSONS RESPONSIBLE FOR DELIVERING THIS COMMUNICATION TO THE INTENDED RECIPIENT ARE INSTRUCTED NOT TO DISCLOSE, COPY OR DISTRIBUTE THIS COMMUNICATION AND ARE NOT AUTHORIZED TO TAKE ANY ACTION WITH RESPECT TO IT OTHER THAN TO ASSURE ITS PROPER DELIVERY TO THE PERSON TO WHOM IT IS ADDRESSED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE TO ARRANGE FOR ITS PROPER RETURN OR DESTRUCTION.

From: Harwood, Jeremy J.O. [mailto:jharwood@BlankRome.com]
Sent: Friday, May 16, 2008 11:31 AM
To: Rahul Wanchoo

EXHIBIT 6

***** RECEIVED MESSAGE *****

16-05-2008 10:15 page no : 4669

STATUS : MESSAGE DELIVERED

Station : 1 BEGINNING OF MESSAGE

RCVD *FIN/Session/USN :FOI 1528 480662
 RCVD *Own Address :PUNBINBBACFE PUNJAB NATIONAL BANK
 RCVD * KULKATA (CALCUTTA)
 RCVD * (FOREIGN EXCHANGE OFFICE)
 RCVD *Output Message Type :199 FREE FUNNAT MESSAGE
 RCVD *Input Time :1137
 RCVD *MIR :080515IRYIUSSNDXXX2902345893
 RCVD *Sent by :IRYIUSSNDXXX BANK OF NEW YORK
 RCVD * NEW YORK,NY
 RCVD *Output Date/Time :080516/0758
 RCVD *Priority :Normal
 RCVD *MOR :BK10805140217900
 RCVD *

RCVD *{s:{108:BK10805140217900}}

RCVD *

RCVD *20 /TRANSACTION REFERENCE NUMBER

RCVD * BK12179-14MAY08

RCVD *21 /RELATED REFERENCE

RCVD * DCA/UMI/114/08

RCVD *19 /NARRATIVE

RCVD * OFAC INVESTIGATIONS

RCVD * THIS WIRE IS RESTRAINED

RCVD * TO A WRIT OF MARITIME ATTACHMENT IN THE MATTER

RCVD * OF THE SHIPPING CORPORATION OF INDIA LTD V.

RCVD * JALDH1 OVERSEAS PTE.LTD.THE ATTORNEYS FOR THE

RCVD * PLAINTIFF ARE BLANK ROML LLP. THEIR PHONE

RCVD * NUMBER IS 212-885-5000. THE DOCKET NUMBER IS 08

RCVD * CV 4328. THE JUDGEMENT AMOUNT IS 4,816,218.00

RCVD * REGARDS, MICHELLE SEGURA

RCVD * FI - LEGAL, 315-765-4160

RCVD * PYMT

RCVD * TRN..P150805141792100 PYMT VIA..NOT EFFECTED *

RCVD * INSTR DATE..080514 VALUE DATE..080514

RCVD * METHOD..SWIFT

RCVD * AMOUNT..93,861.10/USD ORG REF..DCA/UMI/114/08

RCVD * ORDERING CUST... ORDERING

RCVD * BANK..ABIC/PUNBINBBACA DR PARTY..PUNJAB

RCVD * NATIONAL BANK LTD DR ADDR..KULKATA, INDIA CR

RCVD * PARTY..OBS BANK LTD. CR ADDR..SINGAPORE 068809

RCVD * BENE BK/BENE..0003001191018022 ADDRESS..JALDH1

RCVD * OVERSEAS PTE LTD DETAILS PYMT..PAYMENT TOWARDS

RCVD * DEFERRAGE CHARGES BANK INFO..ACC/CUNT BENE INFO

RCVD * 08-05 TUNG LING BUILDING

RCVD *

RCVD *

RCVD *MAC: Authentication Code

RCVD * 00000000

RCVD *CHK: Checksum

RCVD * E04050004455

RCVD *ULH: Delayed message

RCVD *

RCVD *SAC: SWIFT Authentication Correct

RCVD *COP:P: CBI Primary Copy

RCVD *PCU:F: PC Connect : First Copy of the message

RCVD *

20

IB B. Kolkata

***** RECEIVED MESSAGE *****

90715-10055767 D. VERMA

Station : 1 BEGINNING OF MESSAGE

RCVD *FIN/Session/OSN :F01 9923 511343
 RCVD *Own Address :CNRBIN88AXXX CANARA BANK
 RCVD * MUMBAI
 RCVD *Output Message Type :199 FREE FORMAT MESSAGE
 RCVD *Input Time :1812
 RCVD *MIR :080513IRVTU83NDXXX2700273973
 RCVD *Sent by :IRVTU83NDXXX BANK OF NEW YORK
 RCVD * NEW YORK,NY
 RCVD *Output Date/Time :080514/0724
 RCVD *Priority :Normal
 RCVD *MUR :BK108051302200000
 RCVD *

RCVD *(3:(108:BK108051302200000))

RCVD *

RCVD *20 /TRANSACTION REFERENCE NUMBER

RCVD * BK12208-13MAY08

RCVD *21 /RELATED REFERENCE

RCVD * 0345F0TT-313/08

RCVD *79 /NARRATIVE

RCVD * ATTN M INVESTIGATIONS

RCVD * PLEASE BE ADVISED

RCVD * THIS WIRE IS RESTRAINED DUE TO A WRIT OF

RCVD * MARITIME ATTACHMENT IN THE MATTER OF THE

RCVD * SHIPPING CORPORATION OF INDIA LTD V. JALDH

RCVD * OVERSEAS PTE LTD. THE ATTORNEYS FOR THE

RCVD * PLAINTIFF ARE BLANK ROM LLP, PHONE NO.

RCVD * 212-885-5000, DOCKET NO. 08-CV-4328, JUDGMENT

RCVD * AMOUNT IS 4,816,218.00 USD. PLS CONTACT THE

RCVD * ATTORNEYS.

RCVD * REGARDS, MICHELLE

RCVD * SEGURA

RCVD * FT - LEGAL, 315-765-4160.

RCVD * PYMT

RCVD * TRN..FTS080513/083200

RCVD * PYMT VIA..SWIFT MT 103

RCVD * INSTR DATE.. VALUE DATE..

RCVD * METHOD..SWIFT

RCVD * AMOUNT..2,377,533.90/USD

RCVD * ORG REF..0345F0TT-313/08

RCVD * ORDERING CUST..ABIC/CNRBIN88BFD

RCVD * DR PARTY..CANARA BANK

RCVD * DR ADDR..MUMBAI 400 021, INDIA

RCVD * CR PARTY..DBS BANK LTD.

RCVD * CR ADDR..SINGAPORE 060004

RCVD * BENE BK/BENE.. JALDH OVERSEAS PTE LTD

RCVD *

RCVD *

RCVD *MAC: Authentication Code

RCVD * 00000000

RCVD *CHK: CheckSum

RCVD * 961FFE91FDC3

RCVD *DLM: Delayed Message

RCVD *

RCVD *SAC: SWIFT Authentication Correct

RCVD *COP:P: CBT Primary Copy

Kmd Attn: Mr. Maundy

Faxed
14/05/2008

1270220

ING Vysya

BANK

***** NETWORKS BANKING MESSAGE *****

BEGINNING OF MESSAGE

2008-05-14 19:07

page no : 2

ACK *FIN/Session/ISN : 1F01 4107 468002
 ACK *Own Address : VYSAINBBSR ING VYSYA BANK LTD.
 ACK * HYDERABAD
 ACK *Input Message Type : 103 SINGLE CUSTOMER CREDIT TRANSFER
 ACK *Sent to : CHASUS33XXX JP MORGAN CHASE BANK, N.A.
 ACK * NEW YORK, NY
 ACK *Input Time : 1755
 ACK *PTR : 080514VYSAINBBSR4107468002
 ACK *Priority/Obsolet. Period : Normal/100 Minutes
 ACK *
 ACK *20 /SENDER'S REFERENCE
 ACK * 333FUR000075/08
 ACK *23B/BANK OPERATION CODE
 ACK * CRED
 ACK *32A/VAL DTE/CURR/INTERBANK SETTLED AMT
 ACK * 080514USD450000,00
 ACK * 2008-05-14
 ACK * US Dollar
 ACK * 450000,00
 ACK *50K/ORDERING CUSTOMER-NAME & ADDRESS
 ACK * /33304400114)
 ACK * SARAT CHATTERJEE AND CO.
 ACK * (VISAKHAPATNAM) PVT.LTD.
 ACK * 28-2-47, DASHALLA CENTRE, SURYABAGH
 ACK * VISAKHAPATNAM, A.P., INDIA.
 ACK *56A/INTERMEDIARY INSTITUTION - BIC
 ACK * TRVUUS3N
 ACK * BANK OF NEW YORK
 ACK * NEW YORK, NY
 ACK *57A/ACCOUNT WITH INSTITUTION - BIC
 ACK * 08SS8888
 ACK * DBS BANK LTD.
 ACK * SINGAPORE
 ACK *59 /BENEFICIARY CUSTOMER-NAME & ADDR
 ACK * /0003-001191-01-08-022
 ACK * JALDH OVERSEAS PTE LIMITED
 ACK * 101, DECIL STREET, NO.08-06
 ACK * TONG ENG BUILDING, SINGAPORE 069533
 ACK *70 /REMITTANCE INFORMATION
 ACK * /INV/F-00179/ATLANTIC SUN
 ACK * //DATED 04.04.08
 ACK *71A/DETAILS OF CHARGES
 ACK * SHA
 ACK *
 ACK *MAC: Authentication Code
 ACK * 6193A9CA
 ACK *CHK: CheckSum
 ACK * 2919EF2D0369
 ACK *
 ACK *CON: CBT Condensed Output
 ACK *TRN: Transaction Reference Number
 ACK * 333FUR000075/08

***** NETWORK ACKNOWLEDGMENT *****

2008-05-14 19:08

page no : 27

Status : MESSAGE DELIVERED

Station : 5 BEGINNING OF MESSAGE

ACK *FIN/Session/ISN :F01 4107 468004
ACK *Own Address :VYSAINBASP ING VYSYA BANK LTD.
ACK * HYDERABAD
ACK *Input Message Type :103 SINGLE CUSTOMER CREDIT TRANSFER
ACK *Sent to :CHASUS33XXXX JPMORGAN CHASE BANK, N.A.
ACK * NEW YORK, NY
ACK *Input Time :1755
ACK *MCH :080514VYSAINBASP4107468004
ACK *Priority/Obso).Period :Normal/100 Minutes
ACK *
ACK *20 /SENDER'S REFERENCE
ACK * 333FUR000077/08
ACK *200/BANK OPERATION CODE
ACK * CRED
ACK *32A/VAL DTE/CURR/INTERBANK SETTLED AMT
ACK * 080514USD1400000.00
ACK * 2008-05-14
ACK * US Dollar
ACK * 1400000.00
ACK *50K/ORDERING CUSTOMER-NAME & ADDRESS
ACK * /333044001141
ACK * SARAT CHATTERJEE AND CO.
ACK * (VISAKHAPATNAM) PVT.LTD.
ACK * 20-2-47, DASPALLA CENTRE, SURYABAGH
ACK * VISAKHAPATNAM, A.P., INDIA.
ACK *56A/INTERMEDIARY INSTITUTION - BIC
ACK * 1RVTUS3N
ACK * BANK OF NEW YORK
ACK * NEW YORK, NY
ACK *
ACK *57A/ACCOUNT WITH INSTITUTION - BIC
ACK * DBSS8888
ACK * DBS BANK LTD.
ACK * SINGAPORE
ACK *
ACK *59 /BENEFICIARY CUSTOMER-NAME & ADDR
ACK * /0003-001191-01-08-022
ACK * JALDHI OVERSEAS PTE LIMITED
ACK * 101, CECIL STREET, NO.08-06
ACK * TONG ENG BUILDING, SINGAPORE 069533
ACK *70 /REMITTANCE INFORMATION
ACK * /INV/F-00185/K S ANSAL DT.17.04.08
ACK *71A/DETAILS OF CHARGES
ACK * SHA
ACK *
ACK *
ACK *MAC: Authentication Code
ACK * 4859FB34
ACK *CHK: CheckSum
ACK * 589B0894D09D
ACK *
ACK *CDN: CBT Condensed Output
ACK *TRN: Transaction Reference Number
ACK * 333FUR000077/08
ACK *COR: Corresponding Input Message Sequence Number

00



***** NETWORK ACKNOWLEDGMENT *****

2008-05-14 19:08 page no : 2757

Status : MESSAGE DELIVERED
Station : 5 BEGINNING OF MESSAGE

ACK *FIN/Session/ISN :F01 4107 468005
 ACK *Own Address :VYSAINBBASPR ING VYSYA BANK LTD.
 ACK * HYDERABAD
 ACK *Input Message Type :103 SINGLE CUSTOMER CREDIT TRANSFER
 ACK *Sent to :CHASUS33XXX JPMORGAN CHASE BANK, N.A.
 ACK * NEW YORK, NY
 ACK *Input Time :1755
 ACK *MIR :080514VYSAINBBASPR410/468005
 ACK *Priority/Obsolet.Period :Normal/100 Minutes
 ACK *
 ACK *20 /SENDER'S REFERENCE
 ACK * 333FOR000078/08
 ACK *23B/BANK OPERATION CODE
 ACK * CRED
 ACK *32A/VAL DTE/CURR/INTERBANK SETTLED AMT
 ACK * 080514USD269403,72
 ACK * 2008-05-14
 ACK * US Dollar
 ACK * 269403,72
 ACK *50K/ORDERING CUSTOMER-NAME & ADDRESS
 ACK * /333044001141
 ACK * SARAT CHATTERJEE AND CO.
 ACK * (VISAKHAPATNAM) PVT.LTD.
 ACK * 28-2-47, DASPALLA CENTRE, SURYABADH
 ACK * VISAKHAPATNAM, A.P., INDIA.
 ACK *56A/INTERMEDIARY INSTITUTION - BIC
 ACK * IRVTUS3N
 ACK * BANK OF NEW YORK
 ACK * NEW YORK, NY
 ACK *
 ACK *57A/ACCOUNT WITH INSTITUTION - BIC
 ACK * DBBS6666
 ACK * DBS BANK LTD.
 ACK * SINGAPORE
 ACK *
 ACK *59 /BENEFICIARY CUSTOMER-NAME & ADDR
 ACK * /0003-001191-01-08-022
 ACK * JALDHJI OVERSEAS PTE LIMITED
 ACK * 101, CECIL STREET, NO.08-06
 ACK * TONG ENG BUILDING, SINGAPORE 069533
 ACK *70 /REMITTANCE INFORMATION
 ACK * /INV/F-00179/ATLANTIC SUN
 ACK * //DATED 04.04.08
 ACK *71A/DETAILS OF CHARGES
 ACK * SHA
 ACK *
 ACK *
 ACK *MAC: Authentication Code
 ACK * 8D90E03E
 ACK *CHK: Checksum
 ACK * 10292F3C0329
 ACK *
 ACK *CON: CBT Condensed Output
 ACK *TRN: Transaction Reference Number
 ACK * 333FOR000078/08

00574

0551

```
*****
*
*   BLOCKADE SIGN-ON : BILLSFN (B ) BILLNNO (A* )
*
*****
2008MAY13 22:49:35                               NO. 00843
MT S103                               SINGLE CUSTOMER CREDIT TRANSFER    PAGE 00001
                                           FUNC BNREAKE
                                           UMR 9855267

MSGACK {1:F21DBSSSSGSGAXXX5592259620}{4:[177:0805131319]{451:0}}

BASIC HEADER      F 01 DBSSSSGSGAXXX 5592 259620
APPLICATION HEADER I 103 IRVTUS3NXXXX N
USER HEADER       SERVICE CODE 103:
                  BANK. PRIORITY 113:
                  MSG USER REF. 108:
                  VALIDATION 119:

SENDER'S REF.     *20 : 00160T8198938
* * REPEATABLE SEQUENCE 001 * * * * * OCCURRENCE 00001
TIME INDICATION   13 : CODE / / TIME SIGN OFFSET
BANK OPERATION CODE *23 B : CRED
* * REPEATABLE SEQUENCE 002 * * * * * OCCURRENCE 00001
INSTRUCTION CODE  23 : /
TRANS. TYPE CODE  26 :

SETTLEMENT AMOUNT *32 A : DATE 080513 CURRENCY USD AMOUNT 282.726,35
INSTRUCTED AMOUNT 33 : CUR/CODE AMOUNT
EXCHANGE RATE 36 :
ORDERING CUSTOMER *50 K : /0003001191018
                        JALOH OVERSEAS PTE. LTD. , 101
                        CECIL STREET TONG ENG BUILDING
                        08-06 SINGAPORE 069533

SENDING INSTITUTION 51 :
ORDERING INST. 52 :
SENDER'S CORR. 53 :
RECEIVER'S CORR. 54 :
THIRD REIMBURS.INST. 55 :
INTERMEDIARY 56 :
ACCOUNT WITH INST. 57 A : DABADKKK
BENEFICIARY CUSTOMER*59 : / 3206928367
                        BRIDGE OIL LTD
REMITTANCE INFO. 70 : REF 15521 94862
                        BUNKER PYT MV MEDI SHANGHAI C

DETAILS OF CHARGES *71 A : SHA
* * REPEATABLE SEQUENCE 003 * * * * * OCCURRENCE 00001
SENDER'S CHARGES 71 : CURRENCY AMOUNT
RECEIVER'S CHARGES 71 : CURRENCY AMOUNT
SEND. TO REC. INFO. 72 :
REGULATORY REPORT 77 :
MESSAGE NOT DESIGNED FOR DIRECT HUMAN ENTRY OR PROCESSING. ONLY 20 LINES
TRUNCATED TO 75 CHARACTERS OF FIELD 77 ARE SHOWN.
ENVELOPE CONTENTS 77 :
```

TOTAL P.02

EXHIBIT 7



भारतीय नौवहन निगम लिमिटेड The Shipping Corporation Of India Ltd.

(भारत सरकार का उद्यम)
(A Government of India Enterprise)

About Us

About Us

The Shipping Corporation of India was established on 2nd October 1961 by the amalgamation of Eastern Shipping Corporation and Western Shipping Corporation. Starting out as a marginal Liner shipping company with just 19 vessels, the SCI today has metamorphosed into a giant conglomerate having 83 ships of 4.6 million DWT with substantial interests in 10 different segments of the shipping trade.

Sailing through for over 4 decades, the SCI today has a significant presence on the global maritime map and is undoubtedly the Country's premier shipping line. The SCI owns and operates about 35% of the Indian tonnage and operates in practically all areas of shipping business servicing both national and international trades. Keeping in view the demands of the nation's trade, the SCI over the years has diversified into a large number of areas, and is today the only Indian shipping company operating break-bulk service, international container service, liquid / dry bulk service, offshore service, passenger service, in addition to manning / managing a large number of vessels on behalf of various Government Departments and Organisations.

The SCI has contributed immensely to the growth of India's EXIM trade as well as contributing to the Nation's exchequer by being a net earner / saver of valuable foreign exchange. Over the years, SCI has assumed the role of a lifeline for the country during times of emergency and distress by ensuring continued and uninterrupted supply of crude oil, the fuel, which drives the country's economy. The liberalization and globalisation of Indian economy has presented the SCI with a whole lot of opportunities to grow and diversify and the SCI is ideally positioned to avail of these opportunities due to the presence of a modern, young and diversified fleet coupled with the presence of a large pool of well trained and experienced manpower both ashore and afloat to operate it.

The SCI is a profitable commercial venture of Government of India and has an excellent track record of earning profits since its inception barring a brief period when the shipping industry worldwide was under depression. The SCI's annual performance has been rated Excellent consecutively for a record 12 times under the Memorandum of Understanding (MoU) signed with the Government of India.

The Government, mindful of the excellent track record, bestowed the status of Mini Ratna leading to enhanced delegation of powers to the Board in the areas of Capital Investment, Joint Ventures, Opening of New Offices, etc. The continued profitability of the SCI has been due to the innovative and timely strategies and measures adopted by the enlightened SCI Management which included, inter alia, judicious and optimal utilization of available tonnage by deploying it in the most remunerative sectors, commencement of new services in niche markets, identification and expeditious disposal of value destroyers or non-performing assets, forging alliances with the significant players in the market to enhance cargo availability and apportion expenses, administrative cost cutting, etc.

The SCI takes pride in the fact that it is a responsible and socially committed owner, placing greater emphasis on the safety of life, vessels, cargo and the environment it operates in; and has evolved into a highly quality and safety conscious organization. The SCI has also received numerous awards and accolades from various national and international organizations for achieving excellence in customer satisfaction, operational efficiencies, Human Resource training, emergency preparedness etc.

In tune with the worldwide trend of specialisations and the premium placed on core-competencies, the SCI has charted a definitive course of action for the future. The thrust areas for growth and diversification focus on energy transportation including the sunrise segment of LNG transportation and container transportation. The SCI's forays into these areas could either take the form of direct capital investment or by forging strategic and symbiotic alliances with significant players in the market. The SCI has heralded India's entry into the specialised field of LNG transportation by acquiring a stake in the two Indian LNG transportation agreements contracted till date that too after a global bidding process. The presence of the SCI

in these LNG transportation contracts would go a long way in establishing itself as a major LNG transportation player in the world.

The SCI possesses all the ingredients essential for emerging as a truly world class international shipping company and the endeavour of the Management is to facilitate the release of the boundless streams of energy and initiatives and channeling it for the future growth and prosperity of the Company and the Nation.

(C) Shipping Corporation of India Ltd., www.shipindia.com, 22/5/2008